

**The Bay Institute  
California Water Impact Network  
Environmental Defense Fund  
Natural Resources Defense Council  
The Nature Conservancy  
Planning and Conservation League**

*By email and mail*

November 29, 2007

Phil Isenberg, Chair  
Delta Vision Blue Ribbon Task Force  
c/o California Bay-Delta Authority  
650 Capitol Mall, 5<sup>th</sup> floor  
Sacramento, CA 95814

RE: 11/19/07 DELTA VISION DRAFT

Dear Chairman Isenberg,

At the upcoming meeting of the Delta Vision Blue Ribbon Task Force, you will be considering whether to adopt the November 19, 2007, draft "Vision for California's Delta." We have reviewed this latest draft and find it much improved over the previous versions: it is clear, nuanced and impressive in its discussion of the unprecedented degree of existing and emerging risk to the Delta and of the elements necessary to provide a sustainable long-term solution to the Delta's problems. Based on this review, we believe the document represents an enlightened and balanced vision for managing the Delta and resolving long-standing conflicts over competing uses of its resources, and one that is consistent with the recommendations we made in our July 2007 "Long-term Vision for the Sacramento-San Joaquin Delta." We urge you and the other members of the Task Force to adopt the November 19 draft without major substantive changes.

We especially appreciate the document's articulation of a holistic approach based on twelve inter-related elements, and strongly agree that its success is contingent on making decisions about policies that address all these elements together. Disaggregating the approach in order to promote policies that advance one favored set of elements over another will ensure failure in protecting the values provided by the Delta. The draft rightly finds that decisions about individual elements, such as conveyance, should "flow from policies that address the full range of concerns" (pg. 3).

Over the next year, a number of processes, including the Delta Vision Strategic Plan, the Bay-Delta Conservation Plan (BDCP), and the CALFED Ecosystem Restoration Program Conservation Strategy, will be evaluating potential changes to conveyance and/or policies that will directly affect decisions made about conveyance. Based on the information that will be available at the completion of these processes and on the need for a holistic approach that defines the full range of policies that would be implemented in conjunction with potential changes to conveyance and storage and defines the goals that changes to conveyance are intended to help achieve, we believe that alternative (c) on page 10 is the appropriate “entry point” into choices regarding conveyance and storage for subsequent CEQA analyses. However, we also recommend that the CEQA analyses should only be initiated following the completion of the Delta Vision Strategic Plan, BDCP and other processes to allow for new information, policy guidance and target setting to be used to guide selection of a preferred alternative.

As noted above, achieving the desired outcomes described in the draft Vision will require the adoption of clear and measurable targets to protect the values the Delta provides. We recommend that the Task Force acknowledge in the final Vision document the need for such targets and commit to develop a short list of priority targets during the strategic planning process in 2008. Examples of targets that should be considered for a short list include:

- Restore native Delta fish abundance to X% of 1960s – 1970s average levels (representing a threshold above compliance with minimum legal requirements).
- Restore Y acres of tidal and freshwater wetland habitat in the Delta and Suisun Marsh.
- Restore flows to the Delta and San Francisco Bay to at least Z% of annual and seasonal unimpaired runoff.
- Reverse and eliminate subsidence on X% of Delta islands with >2 meter subsidence below sea level by date Y.
- Eliminate discharge of contaminants and nutrients that promote toxic algae blooms and cause major fish kills by date Z.
- Reduce per-capita urban use by X% by date Y and reduce potable use from all sources by Z% by date YY.
- Reduce net agricultural water use by X% by date Y.
- Include Z% of the Delta and Suisun Marsh within a new protected resource area by date X.

Our organizations will provide more detailed recommendations for specific quantitative targets in early 2008.

Consistent with the draft Vision's emphasis on policies that promote resiliency, we also recommend that the Task Force include a brief discussion of how market mechanisms may be used to most efficiently and effectively both reduce demand for and increase water supplies. Mechanisms such as the adoption of market pricing for water and the application to water conservation of the market-based approaches that have produced such dramatic results in the energy policy arena should be promoted, provided that issues of equity and environmental justice are addressed.

Thank you for the opportunity to comment on the draft Vision. We look forward to working with you and the other members of the Task Force to promote a holistic and comprehensive approach to protecting the Delta as an ecosystem, a special place, and a sustainable resource into the future.

Sincerely,

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